

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE GRAND JURY SUBPOENA
PROCEEDING v. CORREIA, et al

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) Docket No. 05-MC-10206-MBB
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**MENOM M. SIVADAS' ASSENTED-TO MOTION FOR
MODIFICATION OF RELEASE CONDITIONS**

Menom M. Sivadas, a material witness in the above-captioned matter, hereby moves the Court for a brief modification of one of the conditions of his release. As support for this Motion, Mr. Sivadas states as follows:

1. Since May 20, 2005, Mr. Sivadas has been detained in Boston as a material witness in this investigation. He has fully complied with all terms of his pretrial release conditions.
2. One of those conditions requires that Mr. Sivadas have “[n]o access to any points of egress (i.e. airport terminals, train stations, ports of call).”
3. On July 12, 2005 – without objection from the United States Attorney’s Office or Pretrial Services – Mr. Sivadas moved this Court for a modification allowing him to accompany a driver to pick up his son at Logan Airport. The Court granted that Motion.
4. Mr. Sivadas’ son is returning home from his trip to Boston on Wednesday, August 3, 2005. His flight departs from Logan Airport at approximately 6:20 p.m. As this Court allowed him to do on July 13, 2005, Mr. Sivadas would like to accompany his son to the airport on Wednesday.
5. Mr. Sivadas has surrendered his passport and does not pose a risk of flight.

6. The requested relief serves the interests of justice.

7. AUSA Jonathan Mitchell has assented to this Motion. The undersigned has left a voicemail message for Pretrial Services Officer David Picozzi, seeking his assent. As of the time of filing, the undersigned has not heard back.

WHEREFORE, Mr. Sivadas respectfully requests that this Motion be granted.

Respectfully submitted,

Menom M. Sivadas

By his attorneys,

/s/ Douglas S. Brooks
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Dated: August 1, 2005